

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA**

TERPSEHORE MARAS,

*Plaintiff,*

v.

CHATTANOOGA NEWS CHRONICLE,  
THEHUFFINGTONPOST, INC.,  
REPRESENTATIVE STEVE COHEN,  
US DOMINION, INC., DOMINION VOTING  
SYSTEMS, INC., DOMINION VOTING  
SYSTEMS CORPORATION, MEDIA  
MATTERS FOR AMERICA, OHIO  
INTELLIGENCE TIPS, ROSS ELDER,  
and ALI ABDUL RAZAQ AKBAR A/K/A  
ALI ALEXANDER,

*Defendants.*

Civil Action No. 1:21-cv-317

**CONSENT MOTION FOR AN EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S COMPLAINT**

Pursuant to Local Rule 12.1, Defendant, the Honorable Steve Cohen hereby moves for an extension of time to respond to Plaintiff's Complaint.

On November 29, 2021, Plaintiff Terpsehore Maras filed her Amended Complaint (ECF No. 1-2) in the Circuit Court of Hamilton County, Tennessee. The initial pleadings were served on Congressman Cohen on November 29, 2021. On December 27, 2021, Congressman Cohen timely removed the case to this Court. *See* Notice of Removal (ECF No. 1).

Federal Rule of Civil Procedure 81(c)(2)(C) requires that a defendant who did not answer prior to removal must answer or present other defenses or objections within "7 days after the

notice of removal is filed.” Fed. R. Civ. P. 81(c)(2)(C). The response to Plaintiff’s Complaint is thus currently due on January 3, 2022. Congressman Cohen respectfully moves for an 18-day extension of the deadline to respond to the Complaint, until **January 21, 2022**. The additional time is necessary given the small size of the Office of General Counsel and the press of other business.

The parties’ counsel conferred about a proposed extension of time, and the Plaintiff consents to the requested 18-day extension.

Respectfully submitted,

/s/ Douglas N. Letter

DOUGLAS N. LETTER (D.C. Bar No. 253492)

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*Counsel for Congressman Steve Cohen*

December 27, 2021

## CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2021, I caused the foregoing document to be filed via the CM/ECF system for the U.S. District Court for the Eastern District of Tennessee and served a copy via electronic mail on the following non-registered CM/ECF filers:

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/s/ Douglas N. Letter  
DOUGLAS N. LETTER